

**TENNESSEE CLAIMS COMMISSION**

**UNIVERSAL CARE OF TENNESSEE, INC.**  
**a corporation,**

**Plaintiff,**

**vs.**

**Case No. 20301822**

**M.D.GOETZ, in his capacity as Commissioner of**  
**the TENNESSEE DEPARTMENT OF FINANCE**  
**& ADMINISTRATION and MANNY MARTINS,**  
**in his capacity as Deputy Commissioner of the**  
**TENNESSEE DEPARTMENT OF TENNCARE,**  
**BUREAU OF TENNCARE,**

**Defendants.**

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**NOTICE OF SUBSTITUTION OF COUNSEL**

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Comes now Paula A. Flowers, Liquidator of Universal Care of Tennessee, Inc. (UCT), by and through counsel, and gives notice that defendant UCT was placed in liquidation on July 2, 2003, and that all further legal representation of UCT will be handled by William B. Hubbard and Robyn E. Smith of the firm Weed, Hubbard, Berry & Doughty, PLLC (the "Counsel for the Liquidator"), 201 4<sup>th</sup> Ave. N., Suite 1420, Nashville, TN 37219. By this Notice, UCT requests that all further communication regarding this matter be directed to Counsel for the Liquidator.

On June 5, 2003, Paula A. Flowers, in her capacity as Commissioner of Department of Commerce and Insurance for the State of Tennessee (the "Commissioner"), filed in the Chancery Court of Davidson County a Verified Petition

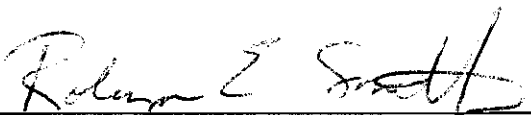
requesting entry of an Order of Liquidation of UCT. UCT objected, and, after a hearing, the Court entered an order of liquidation (the "Order of Liquidation"), appointing the Commissioner as liquidator (the "Liquidator") of UCT. Attached hereto as Exhibit 1 is a copy of the Order of Liquidation<sup>1</sup> entered July 2, 2003. The Liquidator is vested with title to all rights of action of UCT. Tenn. Code Ann. § 56-9-307(a)<sup>2</sup>. Counsel for the Liquidator have been engaged in accordance with the Liquidator's statutory authority set forth in Tenn. Code Ann. § 56-9-310. See, also, Exh. 1, p. 12, ¶ 17.

In accordance with the foregoing, the Liquidator requests that all further communication regarding this matter be directed to Counsel for the Liquidator.

Respectfully submitted,

**WEED, HUBBARD, BERRY & DOUGHTY, PLLC**

By:

  
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**Robyn E. Smith** (16297)  
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(615) 251-5444

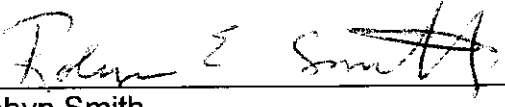
Attorneys for Universal Care of Tennessee,  
Inc., in Liquidation

<sup>1</sup> *State of Tennessee, ex rel. Flowers v. Universal Care of Tennessee, et al.*, Davidson County Chancery Court, Case No. 03-1614-II.

<sup>2</sup> The liquidation of UCT is governed by the Insurers Rehabilitation and Liquidation Act. Tenn. Code Ann. § 56-9-101 *et seq.*

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been forwarded via first class US mail, postage prepaid to: **John Hicks**, Baker, Donelson, Bearman and Caldwell, 211 Commerce Street, Suite 1000, Nashville, Tennessee 37201; and **Steven A. Hart**, Special Counsel and **Kevin Gene Steiling**, Deputy Attorney General, Office of Attorney General, 425 Fifth Avenue, North, P.O. Box 20207, Nashville, Tennessee, 37202-0207, on this the 1<sup>st</sup> day of August, 2003.

  
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Robyn Smith